

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

GEORGE MOORE, individually and on behalf  
of a class of all persons and entities similarly  
situated,

Plaintiff

vs.

NICOLE HUPP & ASSOCIATES, LLC

Defendant.

Case No. 23-cv-04334

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NICOLE HUPP & ASSOCIATES, LLC

Third-Party Plaintiff

vs.

MAVERICK LEADS, LLC, ANTHONY  
PIERCE AND CHRISTOPHER WOLFE

Third-Party Defendants

**MOTION FOR ENTRY OF DEFAULT AGAINST  
MAVERICK LEADS, LLC AND ANTHONY PIERCE**

Defendant/Third-Party Plaintiff Nicole Hupp & Associates, LLC (“Hupp”) moves for an entry of Default against Third-Party Defendants Maverick Leads, LLC and Anthony Pierce under FRCP 55(a) and state as follows:

1. The facts set forth below are sworn to in the Declaration of Thomas M. Wolf, attached hereto as Exhibit 1.
2. Plaintiff filed this lawsuit on July 6, 2023 alleging violations of the TCPA by Hupp. (Dkt. #1).

3. On April 8, 2024 Hupp filed its Third-Party Complaint against Maverick Leads, LLC, Anthony Pierce and Christopher Wolfe alleging causes of action for breach of contract and indemnification. (Dkt. #47).

4. Summons were issued to the Third-Party Defendants on April 17, 2024. (Dkt. #50).

5. Maverick Leads, LLC was served on May 13, 2024 via its registered agent with the Alabama Secretary of State. (Dkt. No. 55; Ex. 1, paras. 4-5). Maverick Leads, LLC's appearance and answer was due on June 3, 2024

6. Anthony Pierce was served on May 15, 2024 at his residence (Dkt. #54; Ex. 1, paras. 7-8). Pierce's appearance and answer was due on June 5, 2024.

7. To date neither Maverick Leads, LLC and Anthony Pierce have appeared or filed any answer to the Third-Party Complaint and, as such, they are both in default.

8. Hupp hereby requests this Honorable Court enter an order of default under FRCP 55(a) against Maverick Leads, LLC and Anthony Pierce.

WHEREFORE Defendant/Third-Party Plaintiff, NICOLE HUPP & ASSOCIATES, LLC, prays to this Honorable Court enter an order of default against Third-Party Defendants Maverick Leads, LLC and Anthony Pierce and for any other relief this Court deems just and proper.

Date: July 31, 2024

By: /s/ Thomas M. Wolf  
Attorneys for Defendant/Third-Party Plaintiff  
Nicole Hupp & Associates, LLC

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing document was filed with the Clerk of the Court using the Court's CM/ECF system on this 31<sup>st</sup> Day of July 2024, which will send electronic notification to the attorneys of records at the email addresses on file with the Court. Additionally, counsel will mail copies of this Motion to Third-Party Defendants who have not yet appeared in the case.

s/ Thomas M. Wolf